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September 15, 2020

**BY ECF**

Hon. Laura Taylor Swain  
United States District Judge  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: United States v. Constantinescu, et al., 19 CR 651 (LTS)**

Dear Judge Swain:

I am writing on behalf of defendant Theofrastos Lymberatos to respectfully request a modification of the defendant's bail conditions which would permit him to travel to New Jersey on September 26, 2020 in order to take his son to the Safari Drive-Thru Adventure at the Six Flags theme park in Jackson, New Jersey. Should this request be granted, Mr. Lymberatos would travel directly to the theme park in New Jersey and return to his home on September 26 without spending the night. Both the government, by AUSA Robert Sobelman, and Pretrial Services take no position on this application.

By way of background, Judge Wang released the defendant on October 10, 2019 pursuant to a \$250,000 personal recognizance bond secured by two financially responsible persons and \$250,000 in property, with travel limited to the Southern and Eastern Districts of New York, and additional conditions including home detention and GPS location monitoring. In the time since his release, the defendant has remained compliant with the aforementioned conditions and Mr. Lymberatos is now permitted to be out of his home every Monday through Friday from 5:50 a.m. through 8:30 p.m. for his employment and to attend anger management classes.

JEFFREY LICHTMAN

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Thank you for the Court's consideration of this application. I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: All counsel (by ecf)  
Pretrial Services (by email)

The foregoing request is granted. DE#338 resolved.

SO ORDERED:

/s/ Laura Taylor Swain 9/15/2020

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HON. LAURA TAYLOR SWAIN, U.S.D.J.